



Audit Report

**The Worshipful Company of Spectacle Makers
(WCSM)**

25 and 26 October 2017

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1 Background

This was the fourth audit of the Worshipful Company of Spectacle Makers (WCSM) since it was approved as an awarding body by SQA Accreditation on 11 August 2010.

WCSM is a nationally-recognised awarding body which provides training for optical technicians and optical practice support staff. It offers nationally-recognised qualifications throughout the United Kingdom. The current SQA accredited provision has been credit rated for the Scottish Credit and Qualifications Framework.

WCSM's headquarters are in London.

1.1 Scope

SQA Accreditation carries out quality assurance activity in line with its *Quality Assurance of Approved Awarding Bodies Policy*. This states the type and frequency of our quality assurance activities, describes our reporting procedures and indicates how the awarding body's Quality Enhancement Rating is calculated.

This was a scoped audit of WCSM based upon, but not limited to, the areas identified within SQA Accreditation's awarding body audit and provider monitoring strategic plan for 2017–18. This included aspects of the awarding body's operational activities in respect of Regulatory Principles 1, 8, 11, 14 and 15.

Our quality assurance activities are conducted on a sampling basis and, consequently, not all aspects of the awarding body's systems, procedures and performance have been considered in this report to the same depth.

SQA Accreditation audit reports are written by exception focusing only on those areas where corrective action is required or recommended. Consequently, this approach to audit reporting does not detail areas where compliance or good practice was found.

The audit was designed to ensure WCSM complies with SQA Accreditation's regulatory requirements namely:

- ◆ *SQA Accreditation's Regulatory Principles* (2014)
- ◆ all *Regulatory Principles* Directives
- ◆ the awarding body's Accreditation Licence

Awarding body documentation considered for review by the Audit Team includes all documents banked on WCSM's SharePoint site at the time of audit and information supplied to support audit activity. Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence.

1.2 Audit Report and Action Plan Timescales

WCSM audit date:	25 and 26 October 2017
Audit Report approved by Accreditation Co-ordination Group on:	6 December 2017
Audit Report to be signed by WCSM:	ACG date + 30 working days
Action Plan to be e-mailed to regulation@sqa.org.uk by WCSM:	ACG date + 30 working days

The process will apply in relation to the timescales specified above:

- ◆ The awarding body will be sent two signed copies of the Audit Report by post.
- ◆ The awarding body must sign both copies of the Audit Report and return one by post to SQA Accreditation in accordance with the timescale specified above.
- ◆ The awarding body will also be e-mailed a copy of the Audit Report (for information only) and an electronic copy of the Action Plan.
- ◆ The awarding body must complete and return the Action Plan in accordance with the timescale specified above and e-mail this in Microsoft Word format to regulation@sqa.org.uk.
- ◆ SQA Accreditation will confirm when the Action Plan is appropriate to address the Issues and present it to Accreditation Co-ordination Group (ACG) for approval.
- ◆ Following approval by ACG, the awarding body will be sent two signed copies of the approved Action Plan by post.
- ◆ The awarding body must sign both copies of the Action Plan and return one by post to SQA Accreditation.

The findings of this Audit Report and the associated Action Plan will be published on SQA Accreditation's website following signed agreement.

SQA Accreditation will continually monitor progress towards completion of the proposed actions identified in the Action Plan and update the awarding body's Quality Enhancement Rating as appropriate.

1.3 Summary of Audit Issues and Recommendations

An Issue has been recorded where evidence shows that the awarding body is not compliant with SQA Accreditation's regulatory requirements. The awarding body must address the Issues and specify corrective and preventative measures to address them through its Action Plan.

The Action Plan is e-mailed to WCSM as a separate document to the Audit Report, and must be submitted to SQA Accreditation in accordance with the timescale specified in 1.2.

As a result of the audit and post-audit activities, four Issues have been recorded and five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 6	The Qualification Handbooks for both the <i>Certificate in Optical Care at SCQF Level 5</i> and the <i>Certificate in Optical Care at SCQF level 7</i> , show incorrect resit timescales for the Level 5 award, as well as an incorrect qualification code for the Level 7 award.	Low
2. Principle 10	WCSM must ensure that all relevant guidance and regulations reflect the need for an appropriate level of quality assurance of examinations at e-assessment venues, as well as an implementation of such activity at the earliest opportunity.	Low
3. Principle 11	In the Association of British Dispensing Opticians' (ABDO) <i>Examination Application Entry Form</i> the statement that there is a requirement set by the regulatory authorities that 'statistical information' regarding equal opportunities be provided is erroneous.	Low
4. Principle 15 and RPDIR - 2	A review of WCSM's quarterly data returns for the period following the 2016 audit to date highlighted anomalies with registration data.	Low

A Recommendation has been noted where SQA Accreditation considers there is potential for improvement. The awarding body is advised to address any Recommendations noted as good practice. However, measures to correct or prevent these are not mandatory and therefore do not form part of the Action Plan.

Recommendation	Detail of Recommendation noted
1. Principles 6 and 11	The awarding body may wish to review information and documentation held on SharePoint, as well as both WCSM and ABDO websites, to ensure currency and adherence to the awarding body's published approach to version control.
2. Principles 10 and 15	WCSM may wish to give careful consideration to how they ascertain the number of potential resit candidates, what actions can be taken to mitigate any potential disadvantage to these candidates, as well as how they will effectively communicate the options available to them to ensure no undue stress arises during the remaining accreditation period.
3. Principles 12 and 13	WCSM may wish to revise the wording of the <i>WCSM Awarding Organisation Customer Service Statement, February 2017</i> , to accurately relate the role of SQA Accreditation in respect of complaints, and to ensure that it is consistent with the information given in the organisation's <i>SOP 18 (Standard Operating Procedure)</i> . It may also wish to revise this particular SOP, as well as <i>SOP 17</i> , to ensure references to SQA Accreditation and its remit are more precise.
4. Principles 14 and 5	WCSM may wish to review how it defines both malpractice and maladministration, reviewing <i>SOP14</i> and any other associated documentation to ensure that it reflects the current position of the qualification regulator.
5. Principles 15 and 5	In conjunction with colleagues at ABDO, WCSM may wish to review the use of endorsed photographs as part of the registration process for online examinations, considering whether the process remains relevant, and ensuring whatever decision is made is applied consistently in relation to all WCSM qualifications and methods of assessment.

1.4 Risk Rating of Issues

SQA Accreditation assigns a rating to each Issue recorded, depending on the impact on or risk to the awarding body's operations, its SQA accredited qualifications and/or the learner. Issues recorded during the audit will count towards WCSM's Quality Enhancement Rating which will, in turn, contribute towards future quality assurance activity. Further detail on how the Quality Enhancement Rating is calculated can be found on the [SQA Accreditation website](#).

2 Detail of Audit Issues and Recommendations

The following sections detail Issues recorded and Recommendations noted against SQA Accreditation's regulatory requirements.

2.1 Issues

Regulatory Principle 6. The awarding body and its providers shall maintain accurate documents, records and data.

A review of WCSM's website highlighted the fact that it had undergone a major review since the 2016 audit and, in the opinion of the audit team, was much more accessible and user-friendly as a result.

It was easy to find information relating to both the Certificate in Optical Care at SCQF Level 5 and the Certificate in Optical Care at SCQF level 7 in the form of the respective Qualification Handbooks. However, the auditors noted that the information provided in the document for the Level 5 qualification incorrectly stated that candidates have five years in which to resit unit examinations.

This information is not consistent with other WCSM and Association of British Dispensing Opticians (ABDO) documentation, which correctly states that the maximum period for resits for the Level 5 qualification is in fact three years.

A recommendation was raised by SQA Accreditation during the 2016 WCSM audit, part of which advised the awarding body 'to ensure the consistency of information' regarding 'the length of time available to candidates who may wish to undertake resits where appropriate'. In the main, this has taken place and other sampled documentation reflects the three-year time period. However, the decision taken by WCSM to extend the accreditation period of only the existing Level 5 qualification, in January 2017, has resulted in an oversight in this particular document.

With regard to the Level 7 qualification, it was noted that despite the Qualification Handbook being amended to fully reflect the changes to the structure of the qualification reflected in re-accreditation of the qualification in February 2017, the qualification code had not been similarly amended — the code allocated as part of the original accreditation was still being used.

This has been recorded as **Issue 1**.

Regulatory Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery, assessment and quality assurance of SQA accredited qualifications.

WCSM's *Standard Operating Procedure (SOP) 3, Approval of Examination Venues* states that 'ABDO will arrange for an inspector (either an External Verifier, a member of the Examinations Team or a WCSM Liveryman) to visit at least one venue during each examination sitting in accordance with a controlled programme that allows for current examination venues to be so inspected at least once every three years'.

Through previous audit and provider monitoring activity, SQA Accreditation has been able to evidence that this programme operates well in respect of written examination venues. However, it is not clear if this controlled programme includes online/e-assessment venues.

Equally, the *WCSM Examination Handbook and Regulations, September 2017* and *SOP 23, E-Examinations*, whilst outlining the full examination process from candidate registration to moderation of marking, do not indicate that there is any planned or unannounced visits to such locations to ensure that they comply with awarding body requirements, as well as ensuring that any the examination is being conducted appropriately.

For SQA accredited provision, the opportunity to use e-assessment only applies to the Certificate in Optical Care at SCQF Level 5. However, indications from ABDO's Examination and Registrations team suggests that there is an increase in the number of candidates making use of this option.

During discussions on this matter, ABDO representatives noted that there is an appreciation of the need to include e-assessment venues in future quality checks and had updated the Guidance notes for conducting WCSM examinations, September 2017, to include the following statement:

'Please note: the Administrator may arrange for no-notice visits to e-examination venues during examinations by approved auditors'.

SQA Accreditation acknowledges that this is a positive step but does not believe that it is sufficiently clear whether this relates to an extension of the controlled programme of visits conducted by WCSM/ABDO representatives or to the qualification regulator's existing quality assurance activities. There remains the need to ensure that all relevant guidance and regulations reflect an appropriate level of quality assurance of examinations at e-assessment venues, as well as an implementation of such activity at the earliest opportunity.

This has been recorded as **Issue 2**.

Regulatory Principle 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.

A review of the ABDO's *Examination Application Entry Form*, available on the ABDO website, for the exams scheduled for 7 and 8 December 2017 notes the following in the context of equal opportunities and associated protected characteristics:

'From time to time, we are required to provide statistical information to the Regulatory Authorities reporting on our candidate base and the results of our efforts to ensure fair access in accordance with the Equality Act 2010'.

The statement of intent with regard to fair access, alongside a clear reference to the relevant legislation and inclusion of the protected relevant protected characteristics, is a positive development following required changes to promoting protected characteristics following an issue raised as the part of the 2016 audit.

However, the statement that there is a requirement set by the Regulatory Authorities that 'statistical information' regarding equal opportunities be provided for consideration is erroneous.

This has been recorded as **Issue 3**.

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

And

RPDIR – 2 Data Submissions

At the 2016 audit, a number of problems were identified in respect of WCSM's quarterly data returns. Primarily related to the registration of candidates, it was noted that candidates registering for the distance learning programme, provided by ABDO College in support of both the Certificate in Optical Care at SCQF level 5 and the Certificate in Optical Care at SCQF level 7, were being included in the statistical returns to SQA Accreditation in error.

The issue was closed out to the satisfaction of SQA Accreditation following the audit, with discussions around the evidence submitted also confirming that candidates subject to the designated number of resits (three) in the specified three-year period for both qualifications would not constitute new registrations within future data returns.

However, a review of WCSM's quarterly data returns for the period following the 2016 audit (held on 25 and 26 October 2016) to the date of the present audit, highlighted further anomalies with registration data. The data provided for Quarter 2, 1 July to 30 September 2017, indicated a number of registrations against current and lapsed SQA provision.

Given the fact that the awarding body holds two examination diets annually, normally June and December of a given year, SQA Accreditation expects to see no registrations outwith Quarter 1, 1 April to 30 June, and Quarter 3, 1 October to 31 December, of each year.

WCSM representatives explained that the presence of the registrations within Quarter 2 was a consequence of the unexpected departure of a member of staff responsible for submitting this data to SQA Accreditation, as well as the time taken to find a suitable replacement. The result was a failure by remaining WCSM personnel to fully appreciate the timescales for submitting data, as well as previous agreements regarding what should be recorded as a new registration.

Consequently, the submission for Quarter 2 was returned showing a number of registrations for the lapsed Level 7 qualification which were in fact resit candidates, who should not have been recorded. The registration data for the Level 5 qualification was accurate but should have been noted within the data submission for Quarter 1.

This has been recorded as **Issue 4**.

2.2 Recommendations

Regulatory Principle 6. The awarding body and its providers shall maintain accurate documents, records and data.

And

Regulatory Principle 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.

A review of information and documentation on SharePoint and, to a lesser extent, both the WCSM and ABDO websites, indicates a need to review and update a range of documentation to ensure currency and adherence to the awarding body's stated version control practice and procedure.

For example, SharePoint contains a range of outdated SOPs — *SOP 36 Conflict of Interest, February 2012*, WCSM Qualifications Committee/Awarding Organisation Goals CSFs and PMs for 2014 and 2015, and an organisational structure for example — as well as documentation such as the *Risk Register 2013*, as well as an organisational structure which is also dated 2013.

There is also a lack of contextual information such as equivalent ABDO and ABDO College organisational structures, as well as documentation such as the Terms of Reference for a range of key WCSM committees such as the Joint Liaison Committee and the Qualifications Committee.

SQA Accreditation recognises that the switch from Quickr to SharePoint, with its associated teething problems around access, as well as the departure of WCSM personnel responsible for updating the information available to the qualification regulator, has made it somewhat difficult to ensure currency for SQA Accreditation purposes in the short term.

In the main, WCSM and ABDO websites provide clear and concise information and guidance on SQA accredited qualifications. However, there are a few areas that require review for currency. In respect of WCSM, this is already noted as part of Issue 1.

With regard to ABDO, the WCSM section of the relevant website contained *SOP 21 Equal Opportunities and Diversity Policy, March 2011*, which does not correspond with the version provided by WCSM, which notes that *SOP 21* relates to Internal Validation Reports. Discussions with ABDO representatives highlighted that the organisation has also used its own SOPs in the past but that this particular *SOP 21* is not current and is not relevant to WCSM.

Therefore, the awarding body may wish to review the information and documentation held on SharePoint, as well as both WCSM and ABDO websites, to ensure currency and adherence to the awarding body's noted approach to version control.

This has been noted as **Recommendation 1**.

Regulatory Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery, assessment and quality assurance of SQA accredited qualifications.

And

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

In February 2017, WCSM re-accredited the Certificate in Optical Care at SCQF Level 7. The accreditation period for the older version of this award expires on 28 February 2019.

As noted in Issue 4 above, candidates have the opportunity to undertake a designated number of resits within a three-year period. WCSM holds two examination diets annually, usually June and December.

WCSM representatives confirmed that there remain an unspecified number of candidates in a position to undertake resit examinations who could be affected by the fact that the certificate end-date for the lapsed award is less than three years.

For example, candidates who undertook the original Level 7 qualification as part of the 2016 diets will not have three years available to them for resits. Equally, it was noted that there may be a number of candidates from earlier examination diets who have delayed undertaking resits for a wide variety of reasons, and that they will not be aware of the certification end-date and the likely impact upon them being able to complete the qualification.

WCSM representatives also confirmed that transferring candidates from the old Level 7 qualification to the current version is not likely to be an option due to the changes in qualification structure, which saw a reduction from five to four mandatory units.

Therefore, the awarding body may wish to give careful consideration to how they ascertain the number of potential candidates in this position, what actions can be taken to mitigate any potential disadvantage to these candidates, as well as how they will effectively communicate the options that are available to them to ensure that no undue stress arises as a consequence of the remaining accreditation period.

This has been noted as **Recommendation 2**.

Regulatory Principle 12. The awarding body and its providers shall have open and transparent systems to manage complaints.

And

Regulatory Principle 13. The awarding body and its providers shall have clear, fair and equitable procedures to manage appeals.

A review of the *WCSM Awarding Organisation Customer Service Statement, February 2017*, highlighted that it does not make any reference to the role of SQA Accreditation in respect of

complaints and appeals and how a complainant may make contact with the qualification regulator.

In respect of complaints, the information in the customer service statement is not consistent with *SOP 18 Handling Complaints*, which states that candidates 'sitting for a qualification accredited by the Scottish Qualifications Authority (SQA) have a right to complain directly to the SQA itself'. WCSM may wish to ensure that any future revision of the SOP contains a specific reference to SQA Accreditation rather than the generic SQA.

In respect of appeals, *SOP 17 Handling of appeals*, whilst noting that candidates have the right of appeal to SQA Accreditation, it does not make it clear that the qualification regulator is unable to overturn assessment decisions or academic judgements.

Therefore, WCSM may wish to revise the wording of the *WCSM Awarding Organisation Customer Service Statement, February 2017*, to make sure that it accurately relates the role of SQA Accreditation in complaints, and that it is consistent with the information *SOP 18*. It may also wish to revise this particular SOP, as well as *SOP 17*, to ensure references to SQA Accreditation and its remit are more precise.

This has been noted as **Recommendation 3**.

Regulatory Principle 14. The awarding body and its providers shall ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.

And

Regulatory Principle 5. The awarding body shall provide clear information on its procedures, products and services and ensure that they are accurate and appropriate to SQA accredited qualifications.

SOP 14, Dealing with Malpractice & Adverse Effects says at Point 1:

'Allegations of malpractice may refer to the mishandling of examination papers, irregular conduct by invigilators, cheating by students or maladministration on the part of the Awarding Body or an Assessment Centre'.

The audit team believes this to be an indication that the awarding body considers maladministration only to be a facet of malpractice and not a separately defined act.

This approach is not consistent with SQA Accreditation's current position on malpractice and maladministration, stated in both Regulatory Principle 14 and the *Regulatory Principle Guidance Note – Principle 14 Reporting and Managing Cases of Malpractice and Maladministration, 1 June 2017*, which provide separate definitions for both terms. There is a consequently different expectation of the nature of the actions to be taken by the awarding body.

Although the audit found no instances of malpractice and maladministration as reportable incidents, the audit team are of the opinion that the inclusion of maladministration as only a

facet of malpractice allows for the possibility of instances of the former being overlooked or not addressed appropriately.

Therefore, the awarding body may wish to review how it defines both malpractice and maladministration, reviewing *SOP14* and any other associated documentation to ensure that it reflects the current position of the qualification regulator.

This has been noted as **Recommendation 4**.

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

And

Regulatory Principle 5. The awarding body shall provide clear information on its procedures, products and services and ensure that they are accurate and appropriate to SQA accredited qualifications.

On reviewing a range of ABDO documentation in relation to conducting WCSM examinations, including *Guidance Notes for Conducting Written Examinations, February 2016*, *Guidance Notes for Conducting WCSM Examinations, September 2017*, and WCSM Examination Handbook and Regulations, September 2017, it was noted that there was a requirement for candidates undertaking online examinations to provide an endorsed photograph. This photograph is to be returned alongside a completed *Authentication Certificate* used for verifying identity. However, whilst the use of the *Authentication Certificate* constituted part of the overall written examination process, there appeared to be no stated requirement for the inclusion of an endorsed photograph.

During discussions with ABDO representatives responsible for the candidate registration process, it became apparent that there was no clear and consistent understanding of why the process of endorsing photographs is in place, given the use of the *Authentication Certificate*, as well as only being deemed applicable to candidates undertaking online examinations. The general consensus was that the use of such photographs was a legacy from registration processes used for ABDO's own qualifications.

The audit team stressed that they had no particular preference with regard to the process of using such photographs other than that it applied consistently to all candidates or not all.

Therefore, WCSM in conjunction with colleagues at ABDO, may wish to review the use of endorsed photographs as part of the registration process for online examinations, considering whether the process remains relevant and ensuring that whatever decision is made is applied consistently in relation to all WCSM qualifications and methods of assessment.

This has been noted as **Recommendation 5**.

3 Acceptance of Audit Findings

For and on behalf of WCSM:

For and on behalf of SQA Accreditation:

Print name

Print name

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Signature

Signature

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Designation

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